

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS.

**SUPERIOR COURT
DOCKET NO.: new entry**

THOMAS MORRISON,

Plaintiff

vs.

**YUM! BRANDS, INC.,
d/b/a KENTUCKY FRIED
CHICKEN,**

Defendant

COMPLAINT AND JURY DEMAND

COUNT I

1) Plaintiff, Thomas Morrison, is an individual, who at all times relevant hereto, resided in Rockland, Plymouth County, Massachusetts.

2) Defendant, Yum! Brands, Inc., d/b/a Kentucky Fried Chicken, hereinafter [Kentucky Fried Chicken] is a duly organized and existing Kentucky corporation with a principal place of business in Louisville, Kentucky and regularly conducting business and deriving substantial revenue in the Commonwealth of Massachusetts.

3) Jurisdiction of the subject matter is conferred on the Court by Ch. 223A §1 of the General Laws of Massachusetts.

4) On May 21, 2010, the Plaintiff, Thomas Morrison, was lawfully on the premises owned by the Defendant, Kentucky Fried

Chicken, located in Norwell, Massachusetts.

5) On May 21, 2010, the Plaintiff, Thomas Morrison, was caused to slip and fall in the restroom located in the above-described premises in Norwell, MA and thereby sustained serious and permanent physical and emotional injury.


6) Plaintiff's fall as heretofore described and his resultant injuries were the direct and proximate result of Defendant's negligent care, maintenance, control and use of the subject premises in that, inter alia, they allowed the existence and use of the subject premises in an unreasonably dangerous and defective condition.

7) As the direct and proximate result of the Defendant's negligence, Plaintiff, Thomas Morrison, was caused to suffer severe and permanent physical injuries. By reason of said injury, the Plaintiff has been caused to suffer permanent loss of function and mobility; he has been caused to incur expense for hospital and medical treatment; his ability to work and earn income has been and will continue to be permanently impaired; his activities have been restricted; and his ability to lead a normal life has been adversely affected.

WHEREFORE, the Plaintiff, Thomas Morrison, demands judgment against the Defendant, Kentucky Fried Chicken, in an amount deemed just and fair by this Court, plus interest and costs of this action.

PLAINTIFF DEMANDS TRIAL BY JURY ON ALL COUNTS.

Respectfully submitted,
Plaintiff, Thomas Morrison,
by his Attorney,


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DATED: May 10, 2013